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Plaintiff in pro per

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JUN 25 2008

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

*Dr*

*C-88*

James Alan Bush,	)	Case No.: C 08-01354 (RS) JF
	)	
Plaintiff,	)	EXHIBIT C
	)	
v.	)	PLAINTIFF'S REQUEST FOR INITIAL
	)	DISCLOSURES AND INFORMAL DISCOVERY
Sunnyvale Department of Public	)	TO DEFENDANT KATHY BICKEL
Safety, et al.,	)	
	)	
Defendants.	)	Magistrate Judge Richard Seeborg
	)	

EXHIBIT C

Plaintiff hereby submits Exhibit "C", which is a copy of plaintiff's request to Defendant, Kathy Bickel, on June 11<sup>th</sup>, 2008, for discovery of initial disclosures under Rule 26(a) of the Federal Rules of Civil Procedure, and for informal discovery of Rule 26(a)(3) pretrial disclosures.

**REQUEST FOR INITIAL DISCLOSURES AND INFORMAL DISCOVERY**

To Kathy Bickel:

Plaintiff hereby demands discovery of the initial disclosures required by Rule 26(a)(1) of the Federal Rules of Civil Procedure, which includes:

1. the name and, if known, the address and telephone number, of each individual likely to have discoverable information – along with the subject of that information – that you intend to use to support your defenses; and,
2. a copy – or a description by category and location – of all documents, electronically stored information, and tangible things in your possession, custody, or control, that you intend to use to support your defenses.

Except where otherwise exempted, you must provide this information to the other parties, without awaiting a discovery request.

Plaintiff also makes the following request for discovery of the following Rule 26(a)(3) pretrial disclosures, which concerns information about the evidence you intend to present at trial:

1. the name and, if known, the address and telephone number, of each witness you expect to present or call if the need arises; and,
2. an identification of each document or other exhibit, including summaries of other evidence.

This request is being made in advance of the Rule 26(f) discovery conference.

**DEADLINE FOR RESPONSE**

If you do not file a response under Rule 26 within 10 days after June 11<sup>th</sup>, 2008, Plaintiff will seek an order to compel discovery of the information requested herein in a manner authorized by the Federal Rules of Civil Procedure.

I affirm that this request is being sent to you on behalf of the plaintiff, this 11<sup>th</sup> day of June, 2008.

\_\_\_\_\_  
James Alan Bush  
Plaintiff and Attorney *in pro se*